

RECEIPT

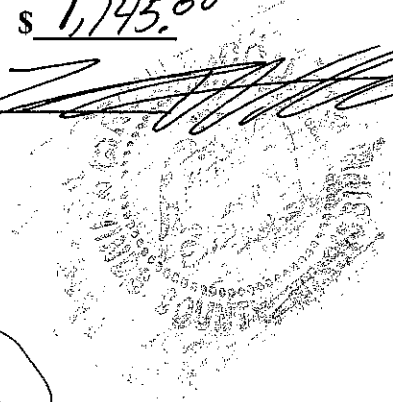
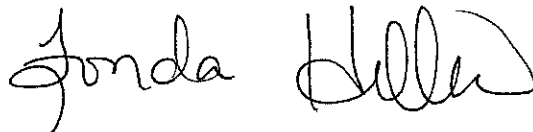
BARBARA DUNN, CIRCUIT CLERK  
HINDS COUNTY, MISSISSIPPI

<u>1145</u> Photocopies @ 1.00	\$ <u>1,145.00</u>
_____ Case Certificate @ 1.50 Each	\$ _____
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TOTAL \$ 1,145.00

DATE: 4/24/12

BY: 

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS, COUNTY, MISSISSIPPI

TAITZ ORLEY DR

PLAINTIFF

VS.

NO. 251-12-000107-CIV

DEMOCRAT PARTY OF MISSISSIPPI ET AL

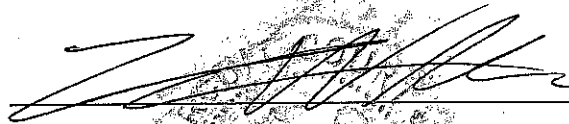
DEFENDANT

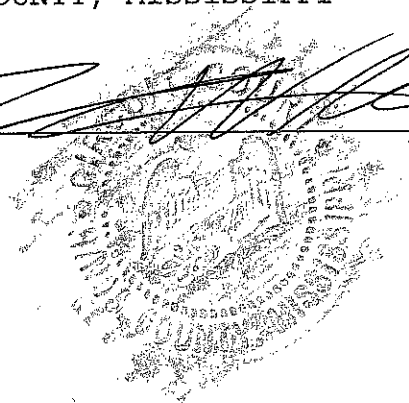
I, BARBARA DUNN, CIRCUIT CLERK, OF THE CIRCUIT COURT  
IN AND FOR THE SAID STATE AND COUNTY DO HEREBY CERTIFY THAT  
THE ATTACHED ARE TRUE AND CORRECT COPIES OF ALL THE PAPERS  
FILED IN THIS OFFICE IN THE ABOVE STYLED AND NUMBERED CAUSE,  
AS OF THIS DATE THE SAME IS OF RECORD IN THIS OFFICE IN DOCKET  
BOOK NO. 12 PAGE NO. 107 TO WIT:

GIVEN UNDER MY HAND AND SEAL OF OFFICE THIS THE 24TH  
DAY OF APRIL, 2012.

BARBARA DUNN, CIRCUIT CLERK  
HINDS COUNTY, MISSISSIPPI

BY

 D.C.



HINDS COUNTY, MISSISSIPPI

1ST JUDICIAL DISTRICT

PAGE NO. 1 CIRCUIT COURT DOCKET INFORMATION FOR CASE 12-000107

FILED: 02/14/0012 CASE TYPE: COMPLAINT

JUDGE: GOWAN WILLIAM

TAITZ ORLEY DR

VS

DEMOCRAT PARTY OF MISSISSIPPI ET AL  
SECRETARY OF STATE OF MISSISSIPPI

ATTORNEYS: SELF REPRESENTED

02/14/12 PETITION

FOR INJUNCTIVE RELIEF  
PETITION FOR DECLARATORY RELIEF

02/14/12 COURT REGISTRY

CHECK #1267 FOR \$300 RECEIVED

3

M FOUNDATION

02/21/12 MISC

EMAILED ORDER APPOINTING  
SPECIAL JUDGE TO ATTY OF  
RECORD

02/21/12 ORDER

OF SUPREME COURT - R KENNETH C 726 638  
OLEMAN APPOINTED SPECIAL JUDGE

02/28/12 PAYMENT

REC FROM DEFEND OUR FREEDOM FO

1

02/28/12 SUMMONS ISSUED

AND RET TO PL- NO COPIES OF CO  
MPLAINT PROVIDED- COPY COST \$2  
88.00 PER COPY

03/01/12 MOTION

OF SECRETARY OF STATE TO DISMISS  
HAROLD E PIZZETTA III, JUSTIN  
L MATHENY, ATTY CC: SAMUEL L

03/01/12 MISC

BEGLEY, DR ORLY TAITZ

03/07/12 MOTION

TO DISMISS PETITION FOR DECLARATORY AND INJUNCTIVE RELIEF AND FOR SANCTIONS  
SAMUEL L BEGLEY, ATTY CC: R

03/07/12 MISC

KENNETH COLEMAN, ORLY TAITZ, HAROLD E PIZETTA, JUSTIN L MATHENY

HINDS COUNTY, MISSISSIPPI

1ST JUDICIAL DISTRICT

PAGE NO. 2 CIRCUIT COURT DOCKET INFORMATION FOR CASE 12-000107

03/15/12 SUMMONS

SENT SHERIFF'S OFFICE - ATTY C  
HECK HINDS

03/15/12 OPPOSITION

TO MOTION TO DISMISS, MOTIONFO  
R SUMMARY AGENT SECT OF STATE,  
MOTION TO RECUSE ATTY GENERAL  
AS FROM REPRESET.OF SECT OF ST

03/15/12 MISC

DR ORLY TAITZ, ATTY CC:ATTORNE  
Y GENERAL,SAMUEL L BEGLEY

03/19/12 OPPOSITION

TO MOTION TO DISMISS BY DEMOCR  
ATIC PARTY OF MISSISSIPPI  
DR ORLEY TAITZ,ATTY

03/23/12 RESPONSE

OF MS SECRETARY OF STATE IN OP  
P TO MOTION FOR SUMMARY AND RE  
SPONSE IN OPP TO MOTION TO REC  
USE ----- JIM HOOD, HAROLD E

03/23/12 MISC

PIZETTA III, JUSTIN L MATHENY,  
ATTYS CC: ORLY TAITZ, SAMUEL L  
BEGLEY

03/23/12 RESPONSE

OF MS DEMOCRATIC PARTY EXE. CO  
MMITTEE TO MOTION FOR SANCTION  
S AND MOTION TO AMEND COMPLAIN  
T ---SAMUEL L BEGLEY,ATTY

03/23/12 MISC

CC: ORLY TAITZ, HAROLD E PIZZE  
TTA, JUSTIN L MATHENY

03/23/12 MOTION

IN LIMINE OF MS DEMOCRATIC PAR  
TY EXE. COMMITTEE

03/22/12 SUMMONS

EX 3-19-12 ON SAM BEGLEY FOR  
DEMOCRATIC PARTY OF MS

03/22/12 SUMMONS

EX 3-19-12 ON TOM RILEY FOR  
SECRETARY OF STATE

03/26/12 ORDER

SET FOR HEARING 4-16-12 IN JA 729 527  
CKSON

03/26/12 MISC

EMAILED ORDER SETTING HEARING  
TO ATTYS OF RECORD THIS DATE

HINDS COUNTY, MISSISSIPPI 1ST JUDICIAL DISTRICT

PAGE NO. 3 CIRCUIT COURT DOCKET INFORMATION FOR CASE 12-000107

03/26/12 MOTION	OF DEMOCRATIC PARTY TO REQUIRE AFFIDAVIT OF PL SAMUEL L BEGLEY, ATTY CC:ORYLY TAITZ, HAROLD E PIZETTA,	
03/26/12 MISC	JUSTIN L MATHENY	
03/30/12 MOTION	FOR ADMISSION OF COUNSEL PRO H AC VICE FOR SCOTT J TEPPER SAMUEL L BEGLEY, ATTY CC:HAROL D E PIZZETTA,JUSTIN L MATHENY,	
03/30/12 MISC	ONLY TAITZ,	
04/02/12 LETTER FILED	OF SAMUEL L BEGLEY TO MS SUPRE ME COURT CLERK	
04/02/12 LETTER FILED	OF SAMUEL L BEGLEY TO MISSISSI PPI BAR	
04/02/12 LETTER FILED	OF SAMUEL L BEGLEY TO JUDGE R KENNETH COLEMAN	
04/02/12 NOTICE	OF CAMERA COVERAGE OF JACKSON JAMBALAYA/NORTHSIDE SUN (JAMES HENDRIX)	
04/04/12 LETTER FILED	FROM SANUEL L BEGLEY TO JUDGE COLEMAN ON NOTICE OF DEFICIENC Y	
04/04/12 MISC	FILE CHECKED OUT BY SAM BEGLEY. 601-969-5545	
04/04/12 MISC	FILE CHECKED BACK IN	
04/05/12 ORDER	SCOTT J TEPPER ADMITTED PRO HA C VICE FOR MS DEMOCRATIC PARTY EXECUTIVE COMMITTEE	730 242
04/05/12 MISC	EMAILED ORDER TO ADMIT TO ATTYS OF RECORD AND PLTF THIS DATE/MAILED TO SAMUEL L BEGLEY	
04/13/12 ORDER	OF CONTINUANCE	731 60

HINDS COUNTY, MISSISSIPPI

1ST JUDICIAL DISTRICT

PAGE NO. 4 CIRCUIT COURT DOCKET INFORMATION FOR CASE 12-000107

04/13/12 ANSWER AND DEFENSES

OF MISSISSIPPI SECRETARY OF STATE  
HAROLD E PIZZETTA III, JUSTIN  
L MATHENY, ATTYS CC: ORLEY TAITZ

04/13/12 MISC

SAMUEL L BEGLEY

04/13/12 ANSWER AND DEFENSES

OF MS DEMOCRATIC PARTY EXECUTIVE COMMITTEE  
SAMUEL L BEGLEY, SCOTT J TEPPER  
ATTYS CC: ORLEY TAITZ, HAROLD E

04/13/12 MISC

PIZZETTA, JUSTIN L MATHENY, SCOTT J TEPPER

04/19/12 MOTION

EMERGENCY FOR MS SUBPOENA TO SUPPORT CALIFORNIA SUB

04/19/12 MOTION

IN LIMINE BY PLAINTIFF

04/19/12 RESPONSE

TO LETTER BY SAMUEL BEGLEY DEMANDING TO WAIVER FOR ATTY SCOTT J TEPPER THE REQUIREMENT TO DISCLOSE ADDRESS

04/19/12 COMPLAINT

FIRST AMENDED, PETITION FOR EMERGENCY INJUNCTION FROM GENERAL ELECTION, PERMANENT INJUNCTION, DECLARATORY RELIEF, TREVLE DA

04/19/12 MISC

CONTINUED FROM LINE 45, DAMAGES IN RICO

04/19/12 STIPULATION

CONVERTING SUBPOENA INTO TOUCH DEMAND

04/19/12 OPPOSITION

TO MOTION TO DISMISS BY DEMOCRATIC PARTY, MOTION FOR SANCTIONS, FOR LEAVE TO FILE AMENDED COMPLAINT AND ADD RICO CAUSE AGAINST

04/19/12 MISC

CONT'D --- DEMOCRATIC PARTY ET AL FOR ELECTIONS FRAUD, SOCIAL SECURITY FRAUD, UTTERING A FORGED ID PAPERS

04/23/12 ORDER

CONTINUED - NO 5-7-12 HEARING 731 558  
DATE

HINDS COUNTY, MISSISSIPPI

1ST JUDICIAL DISTRICT

PAGE NO. 5

CIRCUIT COURT DOCKET INFORMATION FOR CASE 12-000107

04/23/12 MISC

EMAILED ORDER TO ATTY OF REC  
04-24-12

Dr. Orly Taitz, ESQ.  
29839 Santa Margarita Parkway, Ste. 100  
Rancho Santa Margarita, CA 92688  
Ph 949-683-5411 F949-766-7603  
Orly.Taitz@gmail.com  
CA Bar License 223433  
In propria Persona in MS

**FILED**  
FEB 14 2012  
BARBARA DUNN, CIRCUIT CLERK  
BY \_\_\_\_\_ D.C.

FIRST JUDICIAL DISTRICT  
Circuit Clerk's Office  
P.O. BOX 327  
Jackson, MS 39205  
Phone: (601) 968-6628

251-12-107 CIV

DR. ORLY TAITZ, ESQ

) PETITION FOR INJUNCTIVE  
) RELIEF

V  
DEMOCRAT PARTY OF MISSISSIPPI,  
SECRETARY OF STATE OF MISSISSIPPI )

) PETITION FOR DECLARATORY  
) RELIEF

Petitioner herein is seeking injunctive relief in removing from the ballot in the state of Mississippi a Democrat Party Presidential candidate Barack Hussein Obama, II (Hereinafter "Obama") due to elections fraud, due to Obama's use of forged/altered/fraudulently obtained identification records, his use of a Connecticut Social Security number [REDACTED] issued in 1977 in the state of Connecticut to



another individual, born in 1890, due to Obama's use of a computer generated forgery as a copy of his birth certificate, due to Obama's lack of constitutional eligibility. Petitioner is seeking declaratory relief deeming Obama not eligible to be on the ballot for the same reasons.

### **ARGUMENT**

23-15-961

(5) Upon the filing of the petition and bond, the circuit clerk shall immediately, by registered letter or by telegraph or by telephone, or personally, notify the Chief Justice of the Supreme Court, or in his absence, or disability, some other judge of the Supreme Court, who shall forthwith designate and notify from the list provided in Section 23-15-951 a circuit judge or chancellor of a district other than that which embraces the district, subdistrict, county or any of the counties, involved in the contest or complaint, to proceed to the county in which the contest or complaint has been filed to hear and determine the contest or complaint. It shall be the official duty of the circuit judge or chancellor to proceed to the discharge of the designated duty at the earliest possible date to be fixed by the judge or chancellor and of which the contestant and contestee shall have reasonable notice. The contestant and contestee are to be served in a reasonable manner as the judge or chancellor may direct, in response to which notice the contestee shall promptly file

his answer, and also his cross-complaint if he has a cross-complaint. The hearing before the circuit court shall be de novo. The matter shall be tried to the circuit judge, without a jury. After hearing the evidence, the circuit judge shall determine whether the candidate whose qualifications have been challenged is legally qualified to have his name placed upon the ballot in question. The circuit judge may, upon disqualification of any such candidate, order that such candidate shall bear the court costs of the proceedings.

(6) Within three (3) days after judgment is rendered by the circuit court, the contestant or contestee, or both, may file an appeal in the Supreme Court upon

2) Within ten (10) days of receipt of the petition described above, the appropriate executive committee shall meet and rule upon the petition. At least two (2) days before the hearing to consider the petition, the appropriate executive committee shall give notice to both the petitioner and the contested candidate of the time and place of the hearing on the petition. Each party shall be given an opportunity to be heard at such meeting and present evidence in support of his position.

(3) If the appropriate executive committee fails to rule upon the petition within the time required above, such inaction shall be interpreted as a denial of the request for relief contained in the petition.

(4) Any party aggrieved by the action or inaction of the appropriate executive committee may file a petition for judicial review to the circuit court of the county

in which the executive committee whose decision is being reviewed sits. Such petition must be filed no later than fifteen (15) days after the date the petition was originally filed with the appropriate executive committee.

1. Petitioner filed an election challenge with the executive committee of the Democrat party of Mississippi (Exhibit 1 attached)
2. Executive committee of the Democrat party of Mississippi never responded.
3. Petitioner is an aggrieved party and is filing a challenge herein.
4. Petitioner paid a bond of \$300, as required.
5. Petitioner alleges that the Democrat party Presidential candidate Barack Hussein Obama, II does not qualify for the position, that he is seeking.
6. According to the United States Constitution Article 2, section 1, as a Supreme law of the land, President of the United States of America is supposed to be a natural born U.S. citizen.
7. Natural born U.S. citizen is supposed to have valid identification papers to prove his natural born U.S. Citizen status. Such identification papers would include a valid US Social Security number and a valid long form birth certificate.
8. Barack Hussein Obama does not have valid identification documents.
9. Petitioner provides as an Exhibit 2 a transcript of a recent administrative court hearing in the state of Georgia, as well as Exhibit 4 Copy of the Case file. At the

hearing witnesses testified under oath, under the penalty of perjury to the following facts, showing Obama using a fraudulently obtained Social Security number and a computer generated forgery instead of a valid birth certificate.

a. Witness Linda Jordan testified under oath, that she personally ran E-verify for Barack Obama and found that his name does not match Connecticut Social Security number that Obama is using.

b. Witness Susan Daniels, licensed investigator, testified that Connecticut Social Security number [REDACTED] used by Obama, was issued in 1977 in the state of Connecticut to another individual, resident of Connecticut, who was born in 1890. Daniels testified, that in her opinion as an investigator, Social Security number used by Obama is fraudulent

c. Witness John Sampson, recently retired Senior Deportation officer with the department of Homeland security, testified that based on his experience as a senior Deportation officer, both the birth certificate and the Social Security number appear to be fraudulent and if he were to be still working with the deportation department, he would be forwarding the file to the U.S. attorney for criminal prosecution. If the U.S. attorney would not be willing to proceed, he would be seeking a warrant for arrest and deportation.

d. Witness Felicito Papa, graduate of Indiana technical institute testified under oath, that when Obama posted 2009 tax returns on line on April 15, 2010, he did

not flatten the PDF file, as such one can see multiple layers of the file and could see the full Social Security number, that Obama is using. The number in question is a Connecticut Social Security number [REDACTED], which according to investigator Daniels and deportation officer Sampson is fraudulent, and which does not match Obama's name according to e-verify, as testified to by Witness Jordan. Papa, also, testified, that similarly Obama did not flatten the PDF file of the document, posted by Obama on WhiteHouse.gov and claimed to be a true and correct copy of his long form birth certificate. According to Papa the document in question is a computer generated forgery, created by cutting and pasting parts of different documents.

e. Witness Douglas Vogt, who has over twenty years of experience with scanning machines and printers, testified under oath, that a document posted by Obama on line, claiming it to be a scanned copy of his long form birth certificate, represents a computer generated forgery and not a scan of any document.

f. Witness Chris Strunk testified under oath and authenticated a copy of the passport records of Obama's mother, deceased Stanley Ann Dunham. According to aforementioned records, Obama was listed in his mother's passport records under the last name Soebarkah. There is no evidence of Obama ever legally changing his last name.

11. Additionally, a precedent of Minor v Happersett 88 USC 163 (1875) defines natural born US citizen, as a US born to U.S. parents. Obama's father was never a U.S. citizen or even a U.S. resident. Barack Obama Senior was a British subject at the time of Obama's birth, which is an additional impediment for Obama's qualification as a natural born U.S. citizen. Exhibit 3 Proposed

10. Based on all of the above Obama does not have any valid identification papers to prove his natural born U.S. status, he is not Constitutionally qualified and cannot be on the ballot. Based on the above Petitioner is seeking a declaratory relief deeming Obama not to be eligible as a candidate on the ballot, as well as injunctive relief preventing Obama from being placed as a Presidential candidate on the ballot.

### **CONCLUSION**

Based on all of the above petitioner is seeking the following relief:"

1. Declare Barack Hussein Obama not Constitutionally eligible for the position of the U.S. President
2. Injunctive relief preventing the Democrat Party of Mississippi and the Secretary of State of Mississippi from certifying Obama as a candidate on the ballot.
3. Injunctive relief from counting any and all votes for candidate Obama in the primary or general Presidential election.

Respectfully submitted,

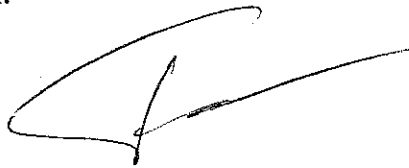
/s/ Dr. Orly Taitz, ESQ



Attestation

I, Orly Taitz, ESQ, attest that all of the above information is provided to the best of my knowledge and belief.

/s/ Dr. Orly Taitz, ESQ



**EXHIBIT 1**

Ballot challenge filed three times via certified mail, FederalExpress and FAX with the Democrat Party of Mississippi

**ORLY TAITZ, ESQ.**  
**29839 SANTA MARGARITA PARKWAY, STE. 100**  
**RANCHO SANTA MARGARITA, CA 92688**  
**PH 949-683-5411 F949-766-7603**  
**ORLY.TAITZ@GMAIL.COM**  
**CA BAR LICENSE 223433**

**EXECUTIVE COMMITTEE**

**DEMOCRAT PARTY OF MISSISSIPPI**

**P.O. BOX 1583, JACKSON, MS 39215.**

PH 601-969-2913 FAX 601-354-1599

01.08.2012

VIA FAX AND CERTIFIED MAIL

**BALLOT CHALLENGE**

**OFFICIAL PETITION TO REMOVE FROM THE LIST OF CANDIDATES  
AN INELIGIBLE CANDIDATE**

**APPLICABLE LAWS AND REGULATIONS**

United States Constitution (U.S. Const. art. II, § 1)

Chapter 15 Mississippi Election Code

Article 29 Election Contests

D Contests of candidate qualifications

§ 23-15-961. Exclusive procedures for contesting qualifications of candidate for primary election; exceptions

(1) Any person desiring to contest the qualifications of another person as a candidate for nomination in a political party primary election shall file a petition specifically setting forth the grounds of the challenge within ten (10) days after the qualifying deadline for the office in question. Such petition shall be filed with the executive committee with whom the candidate in question qualified.



Jan. 14th Qualifying Deadline: Deadline for candidates to file petition to appear on presidential preference primary ballot with the state executive committee of the appropriate political party.

\*NOTE: This deadline falls on SATURDAY (Miss. Code Ann. § 23-15-1093).

(2) Within ten (10) days of receipt of the petition described above, the appropriate executive committee shall meet and rule upon the petition. At least two (2) days before the hearing to consider the petition, the appropriate executive committee shall give notice to both the petitioner and the contested candidate of the time and place of the hearing on the petition. Each party shall be given an opportunity to be heard at such meeting and present evidence in support of his position.

(3) If the appropriate executive committee fails to rule upon the petition within the time required above, such inaction shall be interpreted as a denial of the request for relief contained in the petition.

(4) Any party aggrieved by the action or inaction of the appropriate executive committee may file a petition for judicial review to the circuit court of the county in which the executive committee whose decision is being reviewed sits. Such petition must be filed no later than fifteen (15) days after the date the petition was originally filed with the appropriate executive committee. Such person filing for judicial review shall give a cost bond in the sum of Three Hundred Dollars (\$300.00) with two (2) or more sufficient sureties conditioned to pay all costs in case his petition be dismissed, and an additional bond may be required, by the court, if necessary, at any subsequent stage of the proceedings.

(5) Upon the filing of the petition and bond, the circuit clerk shall immediately, by registered letter or by telegraph or by telephone, or personally, notify the Chief Justice of the Supreme Court,

23-15-1089. Candidates whose names shall be placed on ballot; announcement of names by Secretary of State.

The Secretary of State shall place the name of a candidate upon the presidential preference primary ballot when the Secretary of State shall have determined that such a candidate is generally recognized throughout the United States or Mississippi as a candidate for the nomination of President of the United States.

On or before December 15 immediately preceding a presidential preference primary election the Secretary of State shall publicly announce and distribute to the news media for publication a list of the candidates he intends to place on the ballot at the following presidential preference primary election. Following this announcement he may add candidates to his selection, but he may not delete any candidate whose name appears on the announced list, unless the candidate dies or has withdrawn as a candidate as provided in this chapter.

### **SUMMARY OF THE COMPLAINT**

Petitioner seeks declaratory and injunctive relief, for this Executive Committee of the Democrat Party of Mississippi to declare that Defendant Barack Obama is not eligible to be on the ballot due to the fact, that recently obtained passport records show his legal name to be Barack Obama Soebarkah (Exhibit 10), not the name listed on the list of the nominees. One cannot be on the ballot under a name, that is not legally his. Additionally, Obama's school records from Indonesia, released by the Associated Press, list him under the last name Soetoro (last name of his step father, Indonesian citizen, Lolo Soetoro). (Exhibit 11). There is no evidence of Obama

ever legally changing his name from Soetoro or Soebarkah to Obama. Same school records show his citizenship to be Indonesian, which makes him ineligible as well.

He does not satisfy the “natural born citizen” constitutional requirement for President to be on the ballot due to his foreign citizenship and allegiance to three other nations and due to the precedent of Minor v Happersett (88 U.S. 162 1875). Not only is Obama not qualified to be on the ballot, but evidence, provided in the complaint, shows that candidate Obama does not possess any valid U.S. identification papers needed for the natural born status, that in his tax returns and in his Selective Service certificate, he is using a Connecticut Social Security number [REDACTED], which according to E-Verify and SSNVS (Social Security Number Verification Systems) was never issued to Barack Obama. (Exhibits 1-7) (Full unredacted number is provided in these pleadings, as it is being fraudulently used). Additionally, multiple expert affidavits show Obama's recently released alleged copy of his long form birth certificate to be a computer-generated forgery, created by cutting and pasting bits and pieces from different documents and filling in the blanks with computer graphics, and not a valid document. (Exhibits 3, 8, 9). Plaintiffs are seeking injunctive relief preventing the Executive committee of the Democrat Party from placing Obama's name on the ballot in the Democrat 2012 primary, as well as 2012 general election.

## FIRST CAUSE OF ACTION

### DECLARATORY RELIEF

In 2008, when Mr. Obama ran for the U.S. Presidency, he was never vetted and he never provided any valid documentary evidence of his natural born status.

2. A natural born citizen would be expected to have valid U.S. identification papers, such as a valid long form birth certificate and a valid Social

Security number, which was lawfully obtained by presenting a valid birth certificate to the Social Security administration and which can be verified through official U.S. Social Security verification services, such as E-Verify and SSNVS. The most glaring evidence of Obama's lack of natural born status and legitimacy for the US Presidency, is Obama's lack of most basic valid identification papers, such as a valid Social Security Number ("SSN") and his use of a fraudulently obtained Social Security Number from the state of Connecticut, a state where he never resided, and which was never assigned to him according in part to SSN verification systems "E-Verify" and SSNVS.

3. Reports from licensed investigator Susan Daniels ("Daniels") show that for most of his life Obama used a Connecticut Social Security Number [REDACTED] issued in 1977, even though he was never a resident of the State of Connecticut. In 1977 Social Security numbers were assigned according to the state where the Social Security applications were submitted. In 1977 Obama was nowhere near Connecticut, but rather a young student at the Punahoa school in Hawaii, where he resided.

3. Additionally, according to the review performed by licensed investigators Sankey and Daniels, and as publicly available, national databases revealed another birth date associated with this number, a birth date of 1890. In or around 1976-77, due to changes in the Social Security Administration, many elderly individuals who never had Social Security numbers before, had to apply for their Social Security numbers for the first time in order to obtain Social Security Benefits. It appears that the number in question was assigned to an elderly individual in Connecticut around March of 1977. The death of this elderly individual was never reported, and from around 1980 this number was fraudulently assumed by Barack Obama. *See Exhibit 1* attached hereto, Affidavit of Susan Daniels.

4. Petitioner Taitz was a delegate at the Continental Congress Convention in 2009, where she had a discussion on the matter of Barack Obama's fraudulent use of the aforementioned Connecticut SSN with a recently retired Senior Deportation Officer from the Department of Homeland Security ("DHS"), Mr. John Sampson ("Sampson"). Sampson provided Dr. Taitz with an affidavit attesting to the fact that indeed, according to national databases, Obama is using a Connecticut SSN even though there is no reasonable justification or explanation for such use by one who resided in Hawaii in and around the time the Social Security number in question was issued. *See Exhibit 2* attached hereto, Affidavit of John Sampson.

5. In 2010 Obama posted online on WhiteHouse.gov his 2009 tax returns. Those responsible for posting those returns did not "flatten" the PDF file thereof, so all the layers of modification of the file became visible to the public. One of the pages contained Obama's full SSN [REDACTED] Taitz received an affidavit from Adobe Illustrator program expert Mr. Chito Papa ("Papa") attesting to the fact that the tax returns initially posted by Obama contained the Connecticut SSN [REDACTED] While the file was later "flattened" and the SSN can no longer be seen, thousands of U.S. Citizens and individuals around the world were able to obtain the original file with the full SSN. *See Exhibit 7* attached hereto, Affidavit of Chito Papa.

6. Counsel herein, Taitz checked an official site for Selective Service SSS.gov. She entered the name "Barack Obama" along with his publicly available alleged date of birth [REDACTED] and Connecticut SSN [REDACTED] (which Obama is using in his tax returns as indicated above). Taitz received a verification showing that Obama registered for Selective Service using the Connecticut SSN. *See Exhibit 4* attached hereto, Selective Service Verification.

7. Taitz received an affidavit from a witness named Linda Jordan ("Jordan"), who ran an E-verify check for SSN [REDACTED]. According to E-Verify, there is no match between Obama's name and the SSN he used on his tax returns and Selective Service application. *See Exhibit 5* attached hereto, Affidavit from Linda Jordan.

8. Taitz received an email from a U.S. Army officer, Colonel Gregory Hollister, whereby he did an independent check and found that indeed Obama is using this Connecticut SSN. He also contacted SSNVS (Social Security Number Verification Systems) and found that the number Obama is using was never assigned to him. *See Exhibit 6* attached hereto, Email from Colonel Gregory Hollister.

9. Recently Obama's uncle Onyango Obama was arrested for drunk driving and found to be using for employment a Social Security Number even though he is an illegal alien and not allowed to work. Obama's Aunt Zeutuni Obama was stealing taxpayer dollars by living in subsidized housing and using an Indiana-issued Social Security Number, even though he is an illegal alien and was never a resident of the State of Indiana. therefore, there is a pattern of multiple members of Obama's family using fraudulently obtained Social Security numbers, at Obama's behavior is true to that pattern of Social Security fraud and immigration fraud.

10. Obama's close associate, William Ayers, in his book *Fugitive Days*, admitted to creating over a hundred fraudulent Social Security Numbers using names of deceased infants who did not get their Social Security numbers before their deaths. As he states in *Fugitive Days*, "After the Baltimore fiasco, stealing ID was forbidden. Instead we began to build ID sets around documents as flimsy as a fishing license or a laminated card available in a Times Square novelty shop called "Official ID." We soon figured out that the deepest and most foolproof ID had a government-issued Social Security card at its heart, and the best source of those were dead-baby

birth certificates. I spent impious days over the next several months tramping through rural cemeteries in Iowa and Wisconsin, Illinois and North Dakota, searching for those sad little markers of people born between 1940 and 1950 who had died between 1945 and 1955. The numbers were surprising: two in one graveyard, a cluster of fourteen in another. Those poor souls had typically been issued birth certificates—available to us at any county courthouse for a couple of bucks and a simple form with information I could copy from the death announcement at the archive of the local paper—but they had never applied for a Social Security card. Collecting those birth certificates became a small industry, and within a year we had over a hundred. For years I was a paper-made Joseph Brown, and then an Anthony Lee, remarkably durable identities. My on-paper official residences: a transient hotel in San Francisco and a warehouse in New York.” *William Ayers, Fugitive Days*. Association and close friendship with Ayers is an additional indication and circumstantial evidence of Social Security fraud by Obama, and his lack of valid identification documents to prove not only natural born status, but any status for that matter.

11. For nearly three years after his inauguration Obama refused to provide to the public his long form birth certificate. On April 27, 2011, when Obama posted his alleged long form birth certificate online, just as with his tax returns, he originally did not flatten the file, which means that anyone with an Adobe Illustrator program on his computer could see layers of alterations in this alleged “birth certificate” which looked like a complete fraud and hoax. Multiple long form birth certificates from 1961 are available. In those years green safety paper was not available and was not used. Other birth certificates, as one for Susan Nordyke, born the next day on August 5, 1961, in the same hospital, and signed by the registrar on August 11, 1961, show white paper with yellow aging stains, clear borders, raised seal and a lower serial



number. (Exhibit 9)Obama's alleged birth certificate is on a safety paper, which was not used in 1961, does not have a clear paper, no raised seal, and the serial number is higher than the numbers issued later by the same Registrar. *See Exhibit 3, 9.*

12. According to the affidavit from Adobe Illustrator expert Papa (Exhibit 3, hereto), the released image digital file showed layers of alteration of the alleged birth certificate. It showed a signature of Obama's mother, Stanley Ann D. Soetoro (her married name by her second husband), where it looks as though "Soetoro" was erased, whited out and computer graphics used to add "unham Obama" and a signature "Stanley Ann Dunham Obama" was created by pasting and filling the blanks with computer graphics.

13. Taitz received an affidavit from scanning machines expert Douglas Vogt. ("Vogt") *See Exhibit 8 hereto*, Affidavit of Douglas Vogt. Vogt attests to further evidence of forgery, such as different types of ink used. Some of the document shows as "gray scale" scanning, some as black and white scanning, and some as color scanning. It shows different types of letters and variations in kerning, meaning some letters are encroaching into the space of other letters which is possible only with computer graphics, not with a typewriter used in 1961. Numerous other parameters lead to the same conclusion, that the document in question is not a copy of a 1961 typewritten document, but a computer-generated forgery, created by cutting and pasting bits and pieces from different documents and filling in the blanks with computer graphics.

14. It appears that Obama used a Social Security number of a deceased elderly individual, as well as a birth certificate number of a deceased infant, to fabricate his false identity. Research pointed to the fact that one Virginia Sunahara was born in Honolulu on August 4, 1961 and passed away the next day. Recently her surviving family member demanded



to see her long form birth certificate, but the department of Health provided Mr. Sunahara only with a computer generated short form birth certificate with a serial number, which was suspiciously out of sequence from all the other numbers issued to infants born August 4, 1961.

15. In spite of numerous demands, Director of Health Loretta Fuddy refused to allow the inspection of the original birth certificate of either Obama or Sunahara in lieu of the alleged certified copy, and the Social Security Administration refused to provide even a redacted application for Connecticut SSN [REDACTED], which Obama is fraudulently using.

16. Based on all of the above, Obama does not have any valid identification papers, which are necessary to be a candidate on the ballot, running for the Presidency of the United States

17. Additionally, the term "Natural Born Citizen," as it is applied to the U.S. Presidency, means one born in the country to citizen parents. The plaintiffs submit their evidence showing that from the time of the adoption of the Constitution until today the standard was "One born in the country to parents who are citizens do not owe their allegiance to others." The U.S. Constitution was based in no small measure upon the book *The Law of Nations* by Emer de Vattel, stating that "Natural Born Citizens" are ones born in the "Nations to citizens. (Emer De Vattel, *The Law of Nations*, p. 499, section 212). A similar definition was used by John A Bingham, drafter of the 14<sup>th</sup> amendment to the United States Constitution, who stated during Congressional Hearings that a "natural born citizen is born in the U.S. Territories to parents, who didn't owe allegiance to other sovereignties." A similar definition was used in the case of *Minor v. Happerset*, 88 U.S. 162 (1875).

18. In 2008 natural born citizenship of John McCain was questioned as well due to his birth in the zone of the Panama Canal. In Joint Senate Resolution 511 the Senate

unanimously found Senator McCain to be a "Natural Born" U.S. Citizen. The Senate used the same Vattel two pronged test and found McCain to be eligible for the presidency due to the fact that he was born in the Panama Canal zone to two parents who were U.S. Citizens. Obama's father was never a U.S. citizen. He never had a green card. He was in the U.S. for a few years on a student visa and, as such, Obama did not satisfy either one of the two prongs of the test for natural born status. Even if this office was to subscribe to a more liberal modern definition of natural born citizen, Obama does not qualify as he never proved his birth in Hawaii and is using a computer-generated forgery instead of a valid long form birth certificate and he is fraudulently using a Social Security Number which was never assigned to him. This case shows an unprecedented level of corruption and lawlessness in the federal government and in the government of Hawaii, which allowed Obama to get on the ballot in 2008.

Due to all of the above, Barack Hussein Obama cannot be a Presidential candidate on the ballot in the state of Mississippi.

Respectfully Submitted this day of January 8, 2012

/s/ Dr. Orly Taitz, Esq. 

## **Exhibit 2**

MICHAEL M. MALIHI, Deputy Chief Administrative Law  
Judge

Page 2

APPEARANCES:

FOR THE PLAINTIFF:

ORLY TAITZ, Attorney  
29839 S. Margarita, Suite 100  
Rancho Santa Margarita, California 92688

FOR THE DEFENDANT:

(No appearance.)

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## I N D E X

WITNESSES:	DIRECT	CROSS	REDIRECT	RECROSS
David Farrar	5	--	--	--
Christopher Strunk	8	--	--	--
Susan Daniels	10	--	--	--
Felicito Papa	15	--	--	--
Linda Jordan	19	--	--	--
Douglas Vogt	22	--	--	--
John Sampson	30	--	--	--
Orly Taitz	40	--	--	--

## EXHIBITS: FOR IDENTIFICATION IN EVIDENCE

## Plaintiff:

1 - Strunk FOIA Request	10	--
2 - Daniels Affidavit	14	--
3 - Papa Affidavit	19	--
4 - Jordan Affidavit	21	--
5 - Vogt Affidavit	30	--
6 - Sampson Affidavit	39	--
7 - (Unidentified on the record)	45	--

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P R O C E E D I N G S

JUDGE MALIHI: Counsel, would you introduce yourself and your client, please?

MS. TAITZ: Yes. Orly Taitz and I'm representing five clients -- Mr. David Farrar, who is in the courtroom.

MR. FARRAR: Good morning, sir.

MS. TAITZ: Ms. Leah Lax, Ms. Laurie Roth, Mr. Thomas Malaren and Mr. Cody Robert Judy.

JUDGE MALIHI: Counsel, before you start, I'm going to give you two hours maximum, we will conclude at 12:15.

MS. TAITZ: Thank you, Your Honor.

JUDGE MALIHI: And if you can do it a little bit faster, I would appreciate it.

MS. TAITZ: I'll do my best.

JUDGE MALIHI: Thank you.

MS. TAITZ: Mr. Farrar, please.

Just'a quick introduction. Please provide for the Court your name and spell your last name.

MR. FARRAR: David Farrar, F-a-r-r-a-r.

MS. TAITZ: Mr. Farrar, you can even stand --

THE REPORTER: Wait. Got to swear the witness. Whereupon,

DAVID FARRAR

appeared as a witness herein and, having been first duly

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1 sworn, was examined and testified as follows:

2 DIRECT EXAMINATION

3 BY MS. TAITZ:

4 Q Are you a registered voter in the State of  
5 Georgia?

6 A Yes, ma'am.

7 MS. TAITZ: That's it, you're excused.

8 JUDGE MALIHI: Thank you very much.

9 Counsel, hold on, hold on. What is this  
10 (indicating)?

11 (Witness excused.)

12 MS. TAITZ: This is a clip from the news, just  
13 showing that when Mr. Obama resided in Indonesia, it shows a  
14 book of records from Indonesia showing his last name in the  
15 school book of records listed as Soetoro and nationality  
16 Indonesian, not U.S. citizen.

17 JUDGE MALIHI: I don't need to see the video.

18 MS. TAITZ: That's it.

19 JUDGE MALIHI: Okay.

20 MS. TAITZ: Can we go back a little bit?

21 JUDGE MALIHI: Counsel, I don't see how that's  
22 relevant to the issue before me.

23 MS. TAITZ: Well, in order for one -- first of  
24 all, in order for one to be on the ballot in the State of  
25 Georgia, he needs to be under a name that is legally his.



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1 JUDGE MALIHI: You can argue that to me, but I  
2 don't need to see the video.

3 MS. TAITZ: Okay, go to the next one.

4 JUDGE MALIHI: What's the next one?

5 MS. TAITZ: Okay, so -- okay, so, it states that  
6 he was registered in the book of records in the school in  
7 Indonesia where she's staying, which was Basuki school in  
8 Jakarta, Indonesia under last name Soetoro. Next.

9 I will not go into detail -- okay, let's stop here  
10 -- I will not go into detail into the issue of what natural-  
11 born citizen is because we have limited time, a prior  
12 counsel already stated this.

13 JUDGE MALIHI: Counsel, please address the Court,  
14 not the audience.

15 MS. TAITZ: And I will be using the same precedent  
16 of *Minor v. Happersett* and I would also state that since the  
17 Constitution was adopted, the legal treatise that was  
18 commonly used by the framers of the Constitution was Emerich  
19 de Vattel, a well-known --

20 JUDGE MALIHI: Counsel, are you arguing or are you  
21 testifying?

22 MS. TAITZ: That's my opening statement.

23 JUDGE MALIHI: Okay, please step up to the podium.

24 MS. TAITZ: Emerich de Vattel, who was a well-  
25 known scholar and constitutionalist and diplomat stating

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1 that natural-born citizen -- and it was a legal treatise  
2 that existed at the time the Constitution was adopted --  
3 stating "natural-born citizen is one born in the country to  
4 parents who are citizens of the country."

5 The first Justice of the Supreme Court of the  
6 United States, John Jay, a well-known letter that was  
7 included in Federalist Letters, stated to George Washington  
8 -- permit me to hint that it is important for the commander  
9 in chief to be a natural born-citizen, not to have a  
10 foreigner.

11 Lastly, there was a question in regards to the  
12 14th Amendment. And John Bingham, who was the framer of the  
13 14th Amendment, in the discussions in Congress relating to  
14 the adoption of the 14th Amendment, specifically stated  
15 natural-born citizen is one who is born in the country to  
16 parents who don't owe allegiance to other sovereignties.

17 As we know, when Mr. Obama was born, his father  
18 was a citizen -- actually a British citizen because in 1961,  
19 Kenya was part of --

20 JUDGE MALIHI: Counsel, let me stop you.

21 Would you save your argument for the closing and  
22 let me hear from your witnesses. Your second witness,  
23 please.

24 MS. TAITZ: Okay, Mr. Strunk.

25 JUDGE MALIHI: Good morning, sir.

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1 MR. STRUNK: Good morning, Your Honor.

2 Whereupon,

3 CHRISTOPHER STRUNK

4 appeared as a witness herein and, having been first duly  
5 sworn, was examined and testified as follows:

6 DIRECT EXAMINATION

7 BY MS. TAITZ:

8 Q Mr. Strunk, do you recognize this document?

9 A My name is Christopher Earl Strunk and I'm from  
10 New York. I'd like to vote in Georgia, but it's not  
11 possible this year.

12 Q I'm just asking, do you recognize this document?

13 A Yes, that is a portion of a letter which I  
14 received from the attorney for the Department of State, U.S.  
15 Department of State.

16 MS. TAITZ: Keep going, keep going, keep going,  
17 further, more, more, more -- stop.

18 BY MS. TAITZ:

19 Q Okay, so now what is this document? Is that the  
20 passport record of Stanley Ann Dunham, Mr. Obama's mother,  
21 yes?

22 A This is a renewal form.

23 Q Okay.

24 A Taking him off of her passport.

25 Q Yes. What is the last name that is listed there?

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1 Can you please read the full last name for Mr. Obama on his  
2 mother's passport record?

3 A Soebarkah, S-o-e-b-a-r-k-a-h.

4 Q So in his mother's passport records, Mr. Obama is  
5 listed under last name Soebarkah, according to the records  
6 that you personally received from the State Department,  
7 right?

8 A I can't draw a conclusion on that.

9 Q Okay, but that's what is written there, Soebarkah,  
10 right?

11 A Yes. She wanted that expunged from her record --

12 Q Passport.

13 A -- which we never got. It was delegated (ph.)

14 MS. TAITZ: Okay, thank you, Mr. Strunk.

15 JUDGE MALIHI: You may step down, sir; thank you.

16 (Witness excused.)

17 MS. TAITZ: Next is going to be -- and we're going  
18 to submit into evidence the records -- Freedom of  
19 Information request and response that was received by Mr.  
20 Strunk from the State Department showing that in his  
21 mother's record, Mr. Obama was listed --

22 JUDGE MALIHI: Counsel, you don't need to tell me

23 --

24 MS. TAITZ: Okay. Next will be Ms. Susan Daniels.

25 THE REPORTER: Are we marking this P-1?

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1 JUDGE MALIHI: Yes.

2 (The document referred to was  
3 marked for identification as  
4 Plaintiff's Exhibit Number 1.)

5 (Witness excused.)

6 Whereupon,

7 SUSAN DANIELS

8 appeared as a witness herein and, having been first duly  
9 sworn, was examined and testified as follows:

10 DIRECT EXAMINATION

11 BY MS. TAITZ:

12 Q Ms. Daniels, would you like to state to the Court,  
13 what is your occupation?

14 A I'm a state licensed private investigator in Ohio.

15 Q How many years have you been a licensed  
16 investigator?

17 A Since March of 1995.

18 Q Did you testify in court?

19 A Yes.

20 Q Did you also testify before grand juries as an  
21 investigator?

22 A Yes.

23 Q What -- did you investigate the identification  
24 records for Mr. Obama?

25 A I was hired to look into his background, and the

Page 11

1 first thing I found was a Social Security Number for him  
2 that was issued in the State of Connecticut between the  
3 years of 1977 and '79. And --

4 Q During that time, Mr. Obama would have been 15-16  
5 years old. Where did he reside -- did he reside in the  
6 state of Connecticut at the age of 15 or 16?

7 A No.

8 Q Where did he reside?

9 A Hawaii.

10 Q Now --

11 A And Social Security Numbers are issued in the  
12 state that you live in when you apply for them.

13 Q Okay. So what was your suspicion? What was your  
14 professional understanding -- what was your understanding as  
15 a professional investigator, what did this mean?

16 A I've looked at thousands of Social Security  
17 Numbers and I immediately knew it was fraudulent.

18 Q Thank you. Let's continue, let's go higher and I  
19 would like you to look at the next page -- one second.  
20 More, more, more, keep going, keep going. Down, little bit  
21 down.

22 Okay, so this is the -- what was the number, the  
23 Social Security Number actually that was used?

24 A [REDACTED]

25 Q Now do the first three digits of Social Security

Page 12

1 Number signify the state?

2 A Yes.

3 Q So 042 is what state?

4 A Is Connecticut, 040 to 049 is Connecticut.

5 Q Ms. Daniels, I would like to point to those  
6 numbers at the bottom.

7 A Right.

8 Q Dates of birth associated with Social Security  
9 Number, and we see the first date of birth is 1890 and --  
10 for Mr. Barack Obama, which means that if Mr. Barack Obama,  
11 Mr. Barack Hussein Obama, was born in 1890, he would have  
12 been a hundred and --

13 JUDGE MALIHI: Counsel, are you testifying or are  
14 you asking a question?

15 MS. TAITZ: Sure.

16 BY MS. TAITZ:

17 Q What would be his age?

18 A I can't figure -- I don't have enough fingers.  
19 But I have never -- in all the years I've worked, I've never  
20 seen anything like this. I've seen where like the bottom  
21 two numbers were the American style and the foreign style  
22 appear, but never a number like 1890. And I believe that  
23 the person that originally got the Social Security Number  
24 was born in 1890.

25 Q So what you're saying that it was a stolen Social

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1 Security Number.

2 JUDGE MALIHI: Counselor, don't lead the witness.

3 THE WITNESS: I believe that --

4 JUDGE MALIHI: You can't answer that.

5 THE WITNESS: Pardon me?

6 JUDGE MALIHI: You cannot answer that.

7 BY MS. TAITZ:

8 Q What is your understanding, what does it mean?

9 A I believed from the beginning it was fraudulent.

10 Q Yes. So -- and then we see [REDACTED] and [REDACTED]

11 What does that mean?

12 A That's just two different styles of showing his  
13 birth cert -- his birth date. He was actually born on

14 [REDACTED].

15 Q Now did you also check Mr. Obama's phone records?

16 A First I ran the Social Security Number to check  
17 addresses and the same Social Security Number came up with  
18 addresses for him in Massachusetts, in Illinois, and in  
19 Washington, D.C. And along with those records were a phone  
20 number, and it was always the same phone number and  
21 occasionally the year where it showed his date of birth, it  
22 said 1890.

23 I subsequently then checked the phone records for  
24 this phone number and found the same thing. It would show  
25 intermittently the birth date, instead of August 4, 1961,



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1 said 1890.

2 Q Did you check -- did you double-check the Social  
3 Security Numbers before and after this one? From what state  
4 were those social security numbers?

5 A I got copies from the Social Security  
6 Administration for the Social Security Number ending in 24,  
7 which is the number immediately before his, and 29, and I  
8 got the actual records, including the handwritten  
9 application for the number, because both those people are  
10 deceased. And it showed that those were both issued in  
11 March of 1977, when he would have been 15.

12 Q So it is your testimony that the Social Security  
13 Number that Mr. Barack Obama is using is a number that was  
14 issued to somebody who resided in the state of Connecticut--

15 A That's what I believe.

16 Q -- in 1977.

17 A That's what I believe.

18 Q Anything else you'd like to add?

19 A No.

20 MS. TAITZ: Thank you. Thank you, Ms. Daniels.

21 At this point, I would like to introduce into  
22 evidence Plaintiff's Exhibit Number 2, Affidavit of Ms.  
23 Susan Daniels with the attached documents.

24 (The document referred to was  
25 marked for identification as

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1 Plaintiff's Exhibit Number 2.)

2 (Witness excused.)

3 MS. TAITZ: Next, my third --

4 JUDGE MILLER: Is it fourth or third?

5 MS. TAITZ: Fourth witness is going to be Mr.

6 Felicito Papa.

7 Whereupon,

8 FELICITO PAPA

9 appeared as a witness herein and, having been first duly  
10 sworn, was examined and testified as follows:

11 DIRECT EXAMINATION

12 BY MS. TAITZ:

13 Q Mr. Papa, can you please explain to the Court what  
14 is your education?

15 A Okay, first I'm originally from the Philippines  
16 and then I'm a naturalized born citizen of the United  
17 States.

18 And then I studied information technology having  
19 graduated from ITT Technical Institute in Indianapolis,  
20 Indiana. And from there, we studied various software like  
21 Adobe software.

22 JUDGE MALIHI: Sir, would you just listen to the  
23 question and only answer the question?

24 THE WITNESS: Okay.

25 JUDGE MALIHI: Next question.

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1 BY MS. TAITZ:

2 Q What -- so your education is in information  
3 technology?

4 A That's correct.

5 Q From ITT. Mr. Papa, what kind of software do you  
6 usually use in your work?

7 A With web designing and development, it's a popular  
8 software to use Adobe Photoshop and Adobe Illustrator.

9 Q Thank you. I'm going to point to this document.  
10 Is that the affidavit that you provided me?

11 A That's true, yes.

12 Q Now was that the birth certificate -- or alleged  
13 copy of a birth certificate that Mr. Obama posted online?

14 A That's correct.

15 Q Now what -- okay, let's go to the next page.  
16 Okay, stop.

17 Now when Mr. Obama originally posted this birth  
18 certificate, it was in a .pdf file, was it?

19 A That's correct, yes.

20 Q Was the file flattened, were all the layers of  
21 preparation of the file flattened together, or not?

22 A No, it was not flattened, it was open.

23 Q So when you opened this document in Adobe  
24 Illustrator, did you see one layer or did you see multiple  
25 layers?

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1 A I saw multiple layers, at least six layers.

2 Q Okay. So is this one of the layers?

3 A It is one of the bottom layer.

4 Q Mr. Papa, I would like to point to the number at  
5 the top. We're seeing just one digit there, so where are  
6 the other digits? Were they added in another layer?

7 A Yes, they were added from other graphics and added  
8 to this number.

9 Q So there was one document, and then from another  
10 document they added another part of the document?

11 A That's correct.

12 Q I would like to point to the signature, Stanley  
13 Ann -- and there is only "D." There is no "unham Obama,"  
14 it's missing. Was that brought from another document?

15 A That's correct.

16 Q Now it was on the internet when the original of  
17 the document was posted that there were layers and shortly  
18 thereafter when people opened in Adobe Illustrator, there  
19 were no layers. What happened? Did somebody remove it and  
20 flatten the file and put it back, or what happened?

21 A Nobody -- up to now, nobody has flattened the  
22 file. Anybody who uses Adobe Illustrator can open the file  
23 and then they will see multiple layers.

24 Q Okay. Now I'm going to point to the next  
25 document, the next affidavit for Mr. Papa.

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1 Now did you also study the tax returns that Mr.  
2 Obama posted online in April of -- stop -- in 2010?

3 A Yes, I did.

4 Q Was there the same problem of the file, .pdf file,  
5 not being flattened?

6 A No, it wasn't. Originally it wasn't flattened and  
7 anybody can open it and they would see at least two layers.

8 Q When you looked at the layers, I point to the  
9 number here at the bottom that says [REDACTED]. That was  
10 in one of the layers, right?

11 A That's correct.

12 Q Is it the same number that Ms. Daniels testified  
13 to?

14 A That's correct, yes.

15 Q Let's go to the next page. Okay. And here we see  
16 it was -- it's another page in tax return, says [REDACTED]  
17 the same Social Security Number that Ms. Daniels testified  
18 to?

19 A That's correct.

20 Q After a few days was the file flattened?

21 A Actually after a day, then it was flattened, so  
22 nobody could see the Social Security Numbers any more.

23 MS. TAITZ: Thank you very much, Mr. Papa, that  
24 would be all.

25 I would like to introduce into evidence affidavits

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1 from -- submitted by Mr. Papa in regards to the birth  
2 certificate and Social Security Number of Mr. Obama.

3 (The document referred to was  
4 marked for identification as  
5 Plaintiff's Exhibit Number 3.)

6 (Witness excused.)

7 JUDGE MALIHI: Counsel, who is your next witness?

8 MS. TAITZ: Yes, Your Honor, I'm calling Ms. Linda  
9 Jordan.

10 JUDGE MALIHI: Good morning, Ms. Jordan.

11 MS. JORDAN: Morning.

12 Whereupon,

13 LINDA JORDAN

14 appeared as a witness herein and, having been first duly  
15 sworn, was examined and testified as follows:

16 DIRECT EXAMINATION

17 BY MS. TAITZ:

18 Q Ms. Jordan, do you recognize this affidavit? Is  
19 this an affidavit that you provided for me?

20 A Yes, it is.

21 Q Let's go further -- you know what, go to my set,  
22 Orly's set. If you don't have it here, go to Orly's set  
23 page. Keep going quickly, move, down, down, down, down.  
24 Keep going, keep going, keep going. More, more, more. Yes,  
25 stop.

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1           Okay, is that the document that was attached to  
2 your affidavit?

3           A     Yes, one of them.

4           Q     Is that E-Verify for Mr. Obama?

5           A     Yes.

6           Q     And is that the Social Security Number that was on  
7 Mr. Obama's tax return, [REDACTED]?

8           A     Yes.

9           Q     Keep going, keep going -- higher -- no, down, down  
10 little bit. No, up, up, go up. Stop, down, down -- I  
11 apologize. Up -- go down. Just one second, please. More,  
12 more, more, more, more. Stop, stop.

13                Okay, little bit lower, little bit lower, little  
14 bit lower. Little bit lower so we can see what's on the  
15 bottom tier of this.

16                So, okay, what does it say here, "SSA record does  
17 not verify"? Is that what it says?

18           A     "SSA record does not verify. Other reason: SSA  
19 found a discrepancy in the record."

20           Q     So the Social Security Number that Mr. Obama is  
21 using from early years, according to Ms. Daniels, and that's  
22 listed on his tax return, does not verify under E-Verify?

23           A     When I ran it on August 17th, 2011, it did not  
24 verify, it came back with this mark.

25                MS. TAITZ: Thank you very much, Ms. Jordan.

Page 21

1           At this point, I would like to introduce into  
2 evidence the affidavit of Ms. Jordan and the E-Verify  
3 statement showing that the Social Security Number that Mr.  
4 Obama is using does not verify under E-Verify.

5                               (The document referred to was  
6 marked for identification as  
7 Plaintiff's Exhibit Number 4.)

8   (Witness excused.)

9           JUDGE MALIHI: Who is your next witness?

10          MS. TAITZ: Next witness is going to be Mr.  
11 Douglas Vogt.

12          JUDGE MALIHI: Good morning, sir.

13          MR. VOGT: Good morning.

14          MS. TAITZ: One second, Your Honor, I'm missing my  
15 page. I apologize.

16                       (Brief pause.)

17          Whereupon,

18                               DOUGLAS VOGT

19          appeared as a witness herein and, having been first duly  
20 sworn, was examined and testified as follows:

21               THE REPORTER: Tell me your name, please.

22               THE WITNESS: Douglas Vogt.

23               THE REPORTER: Last named spelled?

24               THE WITNESS: V-o-g-t.

25                               DIRECT EXAMINATION



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1 BY MS. TAITZ:

2 Q Mr. Vogt, would you like to state for the Court,  
3 please, your occupation?

4 A I own a company called Archive Index Systems,  
5 where we sell document imaging scanners as well as document  
6 imaging systems. I also owned a typesetting company for 13  
7 years too.

8 Q So, for 13 years you dealt with typesetting and  
9 scanners.

10 A Yeah.

11 MS. TAITZ: Testimony from Mr. Vogt.

12 VOICE: I don't have it.

13 THE WITNESS: I've been in the current business  
14 for 18 years now selling scanners and maintaining them.

15 MS. TAITZ: Go to the Orly documents and just show  
16 the birth certificate. Just go to my documents.

17 BY MS. TAITZ:

18 Q Did you examine the alleged copy of a birth  
19 certificate which was -- go down -- which was posted online  
20 by Mr. Obama?

21 A Yes, I did.

22 MS. TAITZ: One second. I would like to know if  
23 there was -- keep going, lower -- here it is. Stop.

24 BY MS. TAITZ:

25 Q -- that you found to be suspicious -- was there

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1 anything that you found to be suspicious. And I would like  
2 first to ask you whether there was haloing on this document.

3 A Yes, the haloing we're referring to is around all  
4 the type and lines, there's a white line. At first, we  
5 didn't quite know what it was until we finally actually  
6 replicated the form and actually redid the thing and figured  
7 out how the forger did it.

8 The haloing is caused by what -- it's a subroutine  
9 in Photoshop called unsharp mask. Now you have to  
10 understand, if a document like this has any evidence of  
11 computer manipulation, it's a fraud. Since my experience is  
12 selling document imaging and actually writing that kind of -  
13 - those kind of programs, this is what the Department of  
14 Health should have done or what they supposedly have done.

15 They had these original forms. There was a  
16 federal law that was passed in 2005 that required them to  
17 scan all the documents --

18 JUDGE MALIHI: Counsel, what was your question --  
19 hold on a second. What was your question?

20 BY MS. TAITZ:

21 Q Mr. Vogt, so -- because we have very limited time  
22 -- Judge already stated we have limited time -- so was there  
23 haloing?

24 A Yes.

25 Q Now normally, if you just take a document, put it

1 in a scanner, would you see haloing?

2 A No, none whatsoever.

3 Q If you use multiple documents and multiple layers  
4 and masking, will you see haloing then?

5 A Yeah, if they used unsharp masks, you did.

6 Q Okay, next point. When we're looking on the left  
7 side of the document, we see sloping. Now if the document--

8 A Curve of the page.

9 Q -- if their document was just scanned, was put in  
10 the scanner, would you see all of the lines sloping or would  
11 you see some of the lines going straight?

12 A I'll explain. They said in their own testimony  
13 that these documents were in books, the originals. So this  
14 was actually scanned on a flatbed scanner, 11 by 17. We've  
15 actually replicated the same thing. And so the parallax or  
16 that curvature would appear. You'll notice that the lines  
17 on the bottom are not bent, but the ones on top are.

18 Q That's not what I'm asking.

19 A That's why. But it would be normal if it was  
20 scanned from a book.

21 Q No, Mr. Vogt, I'm asking, when there is sloping --  
22 we understand that you take a book, you take a picture, you  
23 see sloping. But when you have sloping of the line, would  
24 you also see each typed line to be sloping similarly --  
25 would you see that?

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1           A     From the scanner? Yes, we replicated it, we know  
2     that.

3           Q     Was that something that you saw on Mr. Obama's  
4     birth certificate, or not?

5           A     Yes, on how they --

6           Q     Wait --

7           A     -- copied it, yes.

8           Q     But were there lines that went straight?

9           A     Because -- I have to explain how a scanner works.

10          Q     No, no, we don't have time for that.

11          A     But basically that's normal, we replicated the  
12     same thing that --

13          Q     Mr. Vogt, you're not listening. I'm asking you if  
14     you have sloping, if you just go in the scanner and the  
15     lines are sloping, would you see all the lines sloping  
16     similarly?

17          A     No, if it was on a flatbed and it was just a piece  
18     of paper by itself, no.

19          Q     Okay. Let's look at the next point. Go a little  
20     bit higher -- no, down. Okay. No, no, down, down, down.  
21     No. Stop, stop, stop.

22                     We're looking at the stamp that's on the document,  
23     the date stamp. If somebody -- if it is something that was  
24     just scanned -- Mr. Vogt, something that was scanned and  
25     wants to put a stamp here like this -- stamp, stamp, stamp -

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1 - would it be in the same spot in all three copies or it  
2 would be different at different points?

3 A They would be different, to the extent that the  
4 other ones are separate. And they're actually embossed  
5 stamps actually.

6 Q Okay, now another question. If -- and in Mr.  
7 Obama's records, all three of them, it was exactly in the  
8 same spot --

9 A Yes.

10 Q Another question. When a person is stamping the  
11 date, he goes stamp, stamp, stamp, would it be a line, pixel  
12 by pixel, in straight line, or would you expect it to be a  
13 little bit sideways, a little bit crooked?

14 A No, they are too independent, they're done by hand  
15 even though it's done by an embossing machine for both. We  
16 learned that.

17 Q Mr. Vogt, you're not listening.

18 A I am.

19 Q My question is, if a person is doing it by hand --

20 A There won't be in exactly the same place.

21 Q Okay. Would it be on the line, would it be just  
22 on line, pixel by pixel, or would it be slanted a little  
23 bit?

24 A It would be slanted.

25 Q Was it slanted here?

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1 A No, they're perfectly straight.

2 Q So it looks different from what you would expect  
3 with something coming from the machine, right?

4 A Right.

5 Q Next, in regards to that stamp, would you expect --  
6 -- is it something -- Mr. Obama stated it was just prepared  
7 and sent to him, his attorney brought it right away -- so if  
8 it's something that came straight from the machine and they  
9 put embossed seal, would you expect to see a very clear  
10 embossed seal on that document?

11 A Yes, you would.

12 Q Do you see it here?

13 A No, it's a latent latent image, if you highlight  
14 over by -- I can show you on here.

15 Q Okay.

16 A Right about here (indicating).

17 Q But it's hard to see.

18 A Oh, yeah.

19 Q Next, would you -- now, this is supposed to be a  
20 copy of a document created in 1961, which was created on a  
21 typewriter. On a typewriter, when you type letter by letter  
22 by letter, you don't see letters encroaching on the space --

23 JUDGE MALIHI: Counsel, is that a question or --

24 MS. TAITZ: A question, which is -- I'm just  
25 explaining --

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1 THE WITNESS: What's the aberrations of the  
2 typewriter --

3 BY MS. TAITZ:

4 Q The question is would you expect kerning or  
5 encroachment of one letter going into space of the other  
6 letter on a typewritten document?

7 A No. Typewriters basically are either 12  
8 characters to an inch and they all fit in a specific box six  
9 points wide.

10 Q Okay. What about this document, did you see  
11 kerning here?

12 A Yes, we did. I have examples of it here, but we  
13 can't show it.

14 Q Okay, okay. Yeah. So you would not expect  
15 kerning.

16 A Yes, There was a "t" and a "y" that were kerned  
17 and a couple of other letters also.

18 Q Okay, doesn't matter which letters. So you saw  
19 kerning here.

20 A Yes.

21 Q Next --

22 A The letter spacing was off too and the line  
23 spacing too.

24 Q What about, did you check -- can we go a little  
25 bit higher -- in terms of their number. The number ends with

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1 641. Did you check the numbers, was that sequential?

2 A No, it was hard finding the law, but both the --  
3 there was a Model States Vital Statistics Act and in the  
4 U.S. Department of Health and Education as well as the  
5 Social Security system that both say in the federal regs  
6 that all birth certificate numbers have to be sequential and  
7 they start from zero or one, January 1 at 12:01 a.m.

8 Q Okay.

9 A And they have to be sequential.

10 Q Okay, Mr. Vogt --

11 A Hang on. In fact, in the Social Security system--

12 JUDGE MALIHI: Sir. Just wait for the next  
13 question.

14 BY MS. TAITZ:

15 Q Okay, so I just asked if it was sequential.

16 A Yes.

17 MS. TAITZ: That would be it. Thank you very  
18 much, Mr. Vogt. And at this point --

19 (A document was marked for  
20 identification as Plaintiff's  
21 Exhibit Number 5.)

22 (Witness excused.)

23 JUDGE MALIHI: Your last witness.

24 MS. TAITZ: Is Mr. Sampson.

25 JUDGE MALIHI: Good morning, sir.



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1 MR. SAMPSON: Good morning, Your Honor. How are  
2 you, sir?

3 JUDGE MALIHI: Very good, thank you for coming.  
4 Whereupon,

5 JOHN SAMPSON  
6 appeared as a witness herein and, having been first duly  
7 sworn, was examined and testified as follows:

8 DIRECT EXAMINATION

9 BY MS. TAITZ:

10 Q Okay, Mr. Sampson, can you please state to the  
11 Court, what is your education -- what is your professional  
12 experience?

13 A Okay. First, my full name is John, middle initial  
14 N., last name is Sampson, S-a-m-p as in Paul-s-o-n.

15 Educationally, I received a Bachelor of Arts *cum*  
16 *laude* from Long Island University with a major in criminal  
17 justice and minor in psychology. I attended Thomas M.  
18 Cooley Law School in Lansing, Michigan for a period of two  
19 years, I did not graduate.

20 Q And where did you work?

21 A Subsequent to that, I was a police officer in the  
22 State of New York for 18 months.

23 Subsequent to that, I was hired by the U.S.  
24 Immigration and Naturalization Service. Began my career at  
25 John F. Kennedy Airport in 1981 in June as an immigration